

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**EXHIBIT**  
**2**

**OSWALDO BARRIOS,**  
**on behalf of himself and all others similarly**  
**situated,**

**Plaintiff,**

**V.**

**INSTALLATION SQUAD, LLC; and  
MASTEC NETWORK SOLUTIONS, LLC.**

### Defendants.

**CIVIL ACTION NO. 5:25-cv-291-JKP-  
ESC**

**DEFENDANT MASTEC NETWORK SOLUTIONS, LLC'S OBJECTIONS AND  
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

TO: Plaintiff, Oswaldo Barrios, by and through counsel of record, Matt Bachop, Deats Durst & Owen, PLLC, 8140 N Mopac Expy, Suite 4-250, Austin, Texas 78759 and mbachop@ddollaw.com.

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant MasTec Network Solutions, LLC (“MasTec”) serves its Objections and Answers to Plaintiff Oswaldo Barrios’ First Set of Interrogatories.

Dated: July 2, 2025

Respectfully submitted,

/s/ Nicole S. LeFave

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**ATTORNEYS FOR DEFENDANT  
MASTEC NETWORK SOLUTIONS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the following counsel of record, via email, on July 2, 2025:

Matt Bachop  
DEATS DURST & OWEN, PLLC  
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***Attorney for Plaintiff***

/s/ Kimberly Kauffman

Kimberly Kauffman

**OBJECTIONS AND ANSWERS TO FIRST SET OF INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify all persons who you believe have knowledge of relevant facts and identify the issues upon which you believe they have knowledge.

**ANSWER:** MasTec refers Plaintiff to the individuals identified in Defendant MasTec Network Solutions, LLC's Initial Disclosures, served on Plaintiff on June 3, 2025. MasTec will supplement this answer if it becomes aware of additional responsive information through the course of discovery.

**INTERROGATORY NO. 2:** If Defendant is a partner, a partnership, or a subsidiary or affiliate of a publicly owned corporation that has a financial interest in the outcome of this lawsuit, list the identity of the parent corporation, affiliate, partner, or partnership and the relationship between it and Defendant. If there is a publicly owned corporation or a holding company not a party to the case that has a financial interest in the outcome, list the identity of such corporation and the nature of the financial interest.

**ANSWER:** MasTec objects to this Interrogatory as an improper attempt to circumvent the limitation to the number of interrogatories contained in the Federal Rules of Civil Procedure, as it contains three discrete subparts (identity of parent organization, its relationship with MasTec, and identity of publicly owned organization not a party to the lawsuit with a financial interest in the outcome of the lawsuit), making it three separate interrogatories. *See* Fed. R. Civ. P. 33(a)(1) (limiting interrogatories to "no more than 25 written interrogatories, including all discrete subparts").

MasTec further objects to the phrase "financial interest in the outcome of this lawsuit" as vague and ambiguous because it fails to identify with reasonable particularity the information that it seeks. MasTec interprets this phrase as seeking the identity of any publicly owned corporation that has an ownership interest in MasTec. In so doing, MasTec does not concede that any such publicly owned corporation has a financial interest in the outcome of this lawsuit.

MasTec's sole member is MasTec, Inc. MasTec, Inc. is a publicly owned corporation.

**INTERROGATORY NO. 3:** If Defendant is improperly identified, give its proper identification and state whether you will accept service of an amended summons and complaint reflecting the information furnished by you in answer hereto.

**ANSWER:** MasTec objects to this Interrogatory as an improper attempt to circumvent the limitation to the number of interrogatories contained in the Federal Rules of Civil Procedure, as it contains two discrete subparts (MasTec's proper identification and a statement of whether MasTec will accept service of an amended summons and complaint), making it two separate interrogatories. *See* Fed. R. Civ. P. 33(a)(1) (limiting interrogatories to "no more than 25 written interrogatories, including all discrete subpart).

MasTec further objects to the phrase "improperly identified" as vague and ambiguous because it fails to identify with reasonable particularity the information that it seeks. It is unclear whether Plaintiff is asking whether MasTec is the proper defendant to this action or whether MasTec Network Solutions, LLC is an existing legal entity. MasTec interprets this interrogatory as asking

whether MasTec is the proper defendant to this action.

MasTec states that the MasTec, Inc. entity that contracted with Defendant Installation Squad, LLC is MasTec North America, Inc. MasTec does not concede that it or MasTec North America, Inc. employed Plaintiff or any individual allegedly similarly situated to Plaintiff. MasTec does not agree to accept service on behalf of any other MasTec entity at this time.

**INTERROGATORY NO. 4:** If you contend that some other person or legal entity is, in whole or in part, liable to Plaintiff in this matter, identify that person or legal entity and describe in detail the basis of said liability.

**ANSWER:** Neither MasTec nor MasTec North America, Inc. employed Plaintiff or any individual allegedly similarly situated to Plaintiff. At this time, MasTec takes no position as to the persons or legal entities that may be liable to Plaintiff in this matter. MasTec will supplement this answer if it becomes aware of additional responsive information through the course of discovery.

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OSWALDO BARRIOS,	§	
on behalf of himself and all others similarly	§	
situated,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 5:25-cv-291-JKP-
	§	ESC
INSTALLATION SQUAD, LLC; and	§	
MASTEC NETWORK SOLUTIONS, LLC.	§	
	§	
Defendants.	§	
	§	
	§	

VERIFICATION

My name is Katherine Leaman. My title is Director, Human Resources. I have been authorized by Defendant MasTec Network Solutions, LLC ("MasTec") to verify Defendant's Answers to Plaintiff's First Set of Interrogatories. I have read MasTec's Answers to Plaintiff's First Set of Interrogatories and hereby verify that the responses are true and correct to the best of my knowledge based on information assembled by other employees, agents, and representatives of MasTec, and/or my review of company records.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27<sup>th</sup> day of June, 2025.

Katherine Leaman  
Katherine Leaman